

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

FEB 14 2020

CLERK U.S. DISTRICT COURT
By: _____
Deputy

UNITED STATES OF AMERICA

v.

No. 4:20-MJ- 100

MIKAI WILLIAMS (01)

CRIMINAL COMPLAINT

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

On or about January 22, 2020, in the Fort Worth Division of the Northern District of Texas, defendant **Mikai Williams** knowingly stole, unlawfully carried and took away from the store of Shoot Smart, the premises of a person who was then licensed to engage in the business of dealing in firearms as defined in 18 U.S.C. § 921(a)(11), a firearm, to wit: a Springfield Armory, Model XD Hellcat, 9mm Caliber Pistol, bearing Serial Number AT282272, which was part of the licensee's business inventory and had been shipped or transported in interstate or foreign commerce, in violation of 18 U.S.C. §§ 922(u) and 924(i)(1).

I, Scott C. Satcher, affiant, under oath, duly state that I am a Senior Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been employed with the ATF since August of 2003, and am currently in good standing with said Agency. I have received hundreds of hours of training about firearms related investigation, to include but not limited to, the issuance and execution of search warrants, utilization of cooperating individuals, firearms identification and firearms trafficking and investigation of those who are prohibited from lawfully possessing firearms and ammunition. Prior to being employed with ATF, I was a Deputy with the Harris County Sheriff's Office in Houston Texas for over nine years. In my twenty-five years in law enforcement, I have been involved in many investigations that have resulted in the seizure of firearms and ammunition as well as the successful prosecution of the individuals involved.

I know that it is a violation of:

- Title 18 United States Code, Section 922(u) – for a person to knowingly steal or unlawfully take or carry away from the person or the premises of a person who is licensed to engage in the business of importing, manufacturing, or dealing in firearms, any firearm in the licensee's business inventory that has been shipped or transported in interstate or foreign commerce.
- Title 18 United States Code, Section 922(g)(1) – for any person who knows he has been convicted of a crime punishable by imprisonment for a term exceeding one year to knowingly possess a firearm or ammunition.

This complaint is based upon my personal knowledge and conversations with other law enforcement officers and is based upon the following information:

Probable Cause:

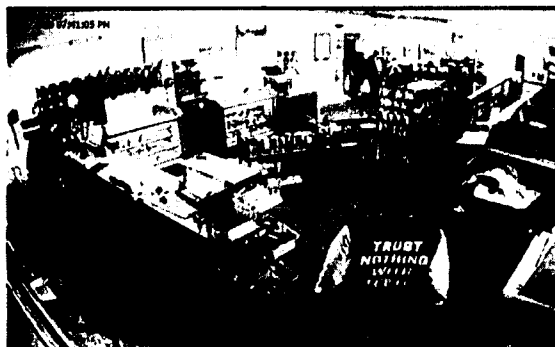
1. On February 6, 2020, Grand Prairie Police Department Officer O. Garcia was dispatched to a theft from a Federal Firearms Licensee (FFL), namely Shoot Smart, 2440 W. Main, city of Grand Prairie, Tarrant County Texas. On arrival, Officer Garcia met Anthony Ortiz, the store manager, who stated that the store's security camera caught a customer stealing a Springfield Hellcat Micro Compact 9mm semi-automatic pistol on or about January 22, 2020.
2. Ortiz stated an inventory showed that a pistol was missing from the gun sale counter. Having reviewed in-store surveillance camera footage, Mr. Ortiz determined a person identified as **Mikai Williams** stole the gun on January 22, 2020, at approximately 7:44pm while a clerk was attending other customers.
3. Ortiz said that **Williams** and his girlfriend Royrea Johnson had used the gun range earlier, which was booked under Johnson's name. Johnson had presented a driver's license, and the store maintained a customer profile. However, **Williams** paid for the range and a box of ammunition using a debit/credit card bearing his name.
4. Closed circuit video footage was provided to Grand Prairie Police Department and me as part of this investigation. Review of the video showed a black male, which investigators have determined to be **Williams**, wearing a black and white jacket

with the writing on the back "Trust no one with teeth" in large white letters on a black background. **Williams** wears this jacket throughout the entirety of the video. A timeline of events is as follows:

- **Williams** and Johnson are observed on video entering the store at approximately 5:49 pm;
- At approximately 5:57 pm **Williams** is observed being shown a rifle by Shoot Smart staff;
- Interaction between **Williams** and Johnson and the staff continued until **Williams** and Johnson enter the range at approximately 6:05 pm, with **Williams** carrying an AR style rifle and what appears to be a pistol box;



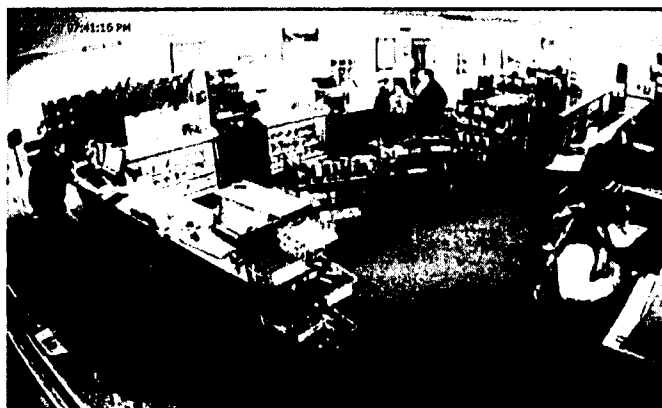
- Both are observed exiting the range together at approximately 7:38 pm and entering the lobby area;
- At approximately 7:38 pm **Williams** is observed handling a pistol hanging on a sales rack and placing it back;
- At approximately 7:38 pm, **Williams** remains very close to the same sale rack looking at multiple firearms;
- At approximately 7:40 pm, **Williams** appears to hand Johnson a set of keys and she exits the lobby. **Williams** then immediately stoops down to look at pistols on the bottom row of the sales rack;
- At approximately 7:41 pm, **Williams** stands up with a pistol in his right hand, concealing it against his leg.



- **Williams** attempts to place it in his right jacket pocket, but it appears not to fit;



- **Williams** then removes the pistol from his pocket continuing to conceal it against his leg before placing it inside his jacket on the left abdomen side, keeping his back to the store staff;



- **Williams** then walks over and engages store staff in conversation at the sales counter, never showing the firearm he has concealed;

- Johnson re-enters the lobby area and is near the sales counter with **Williams** talking with staff;
 - **Williams** never attempts to pay for the firearm before exiting the store premises at approximately 7:44 pm;
 - A different camera view from across the store lobby shows a full bottom row of firearms on the sales rack, and when **Williams** stands up at 7:41 pm, the bottom row is missing a firearm on the left hand side; that same firearm is missing when **Williams** exits the range at approximately 7:44 pm.
5. I have reviewed **Williams**' criminal history and learned that **Williams** has previously been convicted of several crimes punishable by a term of imprisonment exceeding one year, including Felony Evading Arrest Detention, Cause 1531071D, and Felony Assault Bodily Injury Family Member, Cause 1143157D, in Tarrant County, as well as having 3 separate misdemeanor convictions for Assault Bodily Injury Family Member, Cause Numbers 1452019D, 1086549D and 0965287001, also in Tarrant County.
6. On February 7, 2020, I went to Shoot Smart and contacted Anthony Ortiz, the Store Manager, and Bryan Palmer, Inventory Manager. The firearm was identified by packaging and factory placards as a Springfield Armory, Model XD Hellcat, 9mm Caliber Pistol, bearing Serial Number AT282272. According to acquisition and disposition records, the firearm came into the store inventory on January 15, 2020, was received from RSR Group Inc., 4700 Amon Carter Blvd, Fort Worth, and was valued at \$764.95. A sales receipt provided to me confirmed the range to be rented to Johnson, a "loyal customer," and shows **Williams** as the cardholder who paid by debit card bearing last 4 numbers 1663 and verified by PIN.
7. On February 10, 2020, I crafted and presented a photographic lineup of six individuals with like characteristics to the defendant and presented it at approximately 1:47 pm to Shoot Smart Assistant Manager David Watson, who had contact with **Williams** during **Williams**' time at the range. Watson positively identified **Williams** from the other photos as the person he had observed on January 22, 2020. Subsequently Watson circled, dated, timed and initialed just to the right of the photograph of **Williams**.

8. I am an ATF interstate nexus expert and identified the missing firearm as a Springfield Armory, Model XD Hellcat, 9mm Caliber Pistol, bearing Serial Number AT282272. I have determined that the Springfield Armory firearm was made outside the state of Texas and therefore travelled in or affected interstate commerce.

Based upon this information, I respectfully submit that there is probable cause to believe that **Mikai Williams** has violated the above described federal statutes, namely, 18 U.S.C. §§ 922(u) and 924(i)(1).



SCOTT SATCHER

Special Agent

Bureau of Alcohol, Tobacco, Firearms, and Explosives

SWORN AND SUBSCRIBED before me, this 14th day of February, 2020,
at 9:30 a.m. in Fort Worth, Texas.



JEFFREY L. CURETON

UNITED STATES MAGISTRATE JUDGE